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5/18/1992

Facility: Burlington Environmental Pier 91

ID No. WAD00081 2917

Date of Inspection: May 15, 1992

Date of Report: May 18, 1992

Address: 2001 West Garfield Street  
Seattle, Washington 98119

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EPA Region 10

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Purpose:

This inspection was conducted to gather information on facility compliance with applicable regulations for management of hazardous waste under the Washington State and United States hazardous waste laws.

Facility Process Information:

The Burlington Environmental Pier 91 facility is located at Pier 91 on the Seattle waterfront. The area was historically a Navy fuel depot and is within the Port of Seattle boundary. The facility receives and manages waste oil from various sources. Most waste oil received at the facility is sold to Pacific Northern Oil which is co-located. Pacific Northern blends the oil into marine fuels for sale to shipping companys.

Notification and Permits:

Burlington Northern as Chempro filed a Notification of Hazardous Waste Activity on August 13, 1980. Part A of the hazardous waste permit was submitted on November 14, 1980. Ecology is currently working with the facility to write a final permit.

Inspection:

At 9:00 a.m. on May 15, Josh Chaitin, Jeannie Summerhays, and I arrived at the Burlington Environmental's Pier 91 facility in Seattle, Washington. We entered the office and were met by Ron Atwood, John Stiller, and Nate Mathews. The inspection began with a meeting and file review in Mr. Mathews office. Mr. Chaitin as the lead inspector led the discussion.

The facility has recently conducted an investigation to determine the regulatory status of several old tanks. Sludges were sampled and analyzed using TCLP. All samples passed the TC criteria and the tanks are being handled as non-RCRA units.

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A question was asked about the facility's status as a marketer of waste oil. The facility believes that they do not meet the regulatory definition of marketer although they did notify as a marketer. They do meet the management requirements for a marketer, however.

All waste oil shipments are tested for chlorine using the chlor detect kit. Only waste oil that fails this test is taken through the designation process. The generator is given the option of analyzing, declaring the waste a hazardous waste, or taking the waste back.

The facility is having trouble finding adequate leak detection for double bottomed tanks. They may be able to use a system that pressurizes the void space.

A new baker tank has been installed and is being certified as a hazardous waste tank. The tank will be used to store waste antifreeze which is regulated by the state.

The facility receives waste water from Canada which has been treated before shipment. The waste has been designated a non hazardous waste and is not shipped on a manifest. The contract certifies the facility's regulatory status and guarantees proper management of the waste.

We reviewed training plans and records, manifests and shipping records, inspection logs, and financial assurance. The waste analysis plan and contingency plan have been revised and will be submitted to Ecology by June 15.

A site tour was conducted. The only problems noted were in the two labs. The satellite accumulation containers in each lab were not labelled as hazardous waste.

After a short out briefing we ended the inspection and left the facility at 12:10 p.m.

#### Conclusion:

No violations requiring EPA follow up were noted. Ecology will address the satellite labelling problems. The Ecology inspectors were both very well prepared. They conducted the inspection in a professional and efficient manner.